

REMARKS

Applicant respectfully traverses the Election of Species Requirement dated February 24, 2004. Grounds of traversal are as follows.

First, it should be noted that the present application is a National Stage application filed under 35 U.S.C. §371 of PCT/KR 01/02130 and, as a National Stage application, only the "unity of invention" standard applies. See MPEP §1893.03(d) and 37 C.F.R. §1.499. Hence, the Election of Species Requirement is clearly improper for at least this reason.

Further, there is unity of invention between the claims in that a technical feature of the invention is at a top surface of the heat-radiation canopy as exposed to the exterior of the semiconductor package, wherein the heat-radiation canopy is attached to the top surface of the semiconductor. Figures 5E and 6 are merely examples of how this technology can be applied to different embodiments including embodiments that have a lead frame such as shown in Figures 5E and 5F, or solder balls as shown in Figure 6. These different connection mechanism do not diminish the unity of invention.

Additionally, Applicants have added the claim that is clearly generic to both embodiments in order to round out the scope of protection being sought.

Hence, in light of the foregoing, it seems apparent that the Election of Species Requirement should be withdrawn since the present application is a National Stage application. For completeness of response, however, Applicants elect the embodiment of Figure 5E upon which claims 1-34 read. Early and favorable examination on the merits is respectfully requested.

Respectfully submitted,

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